

REMARKS

Claims 1-15 and 18-26 are pending. Applicants have carefully considered the Office Action dated November 14, 2006 ("Office Action") in this Application. Applicants present the above amendments and following remarks in a sincere attempt to place this Application in condition for allowance. Claims 1, 2, 7-8, 20, and 24 have been amended in this Response. Applicants respectfully request reconsideration and allowance in light of the above amendments and the following remarks.

The Drawings stand objected to as allegedly failing to comply with 37 CFR 1.84(p)(5) because "they include the following reference character(s) not mentioned in the description: 202." Office Action, Page 2. Applicants have amended Fig. 2 herein to remove reference character 202. Applicants respectfully submit that no new matter is introduced by this amendment. Accordingly, Applicants respectfully request that the objection to the drawings be withdrawn.

Claims 1-2, 4-15, and 18-26 stand rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent Application Pub. No. 2003/0004831 by Owens ("Owens"). Applicants respectfully traverse these rejections.

Applicants have amended Claims 1, 20, and 24 to recite, in relevant part, "wherein the product location information comprises a map of a retail store and a route through the retail store that passes by the selected retail products within the retail store;" (Claim 1) and "wherein the product location information comprises a map of a retail store and a route through the retail store that passes by the items on the shopping list within the retail store;" (Claims 20 and 24). Support for these amendments can be found, among other places, at Page 7, lines 12-16, Page 8, lines 30-33, Page 9, line 30 to Page 10, line 3, and Page 10, lines 9-23 of the Original Application.

Applicants respectfully submit that Owens does not teach the unique combination of elements now recited in amended Claim 1. For example, Owens' Figures 5 and 6 show Owen's "business method" and "overall shopping flow" for the Owens system. Owens, Paragraphs [0079]-[0080]. Nowhere does Owens even suggest here "the product location information" provided to the end-user by the Owens system "comprises a map of a retail store and a route through the retail store that passes by the items on the shopping list within the retail store" as recited in the pending Claims. *See, e.g.*, Owens, Paragraphs [0204]-[0214].

Similarly, Owens' Figures 13-16 show "use case descriptions" to send a shopping list to a printer (Fig. 13), a personal digital assistant (Fig. 14), a "user's account" (Fig. 15), or a store (Fig. 16). Owens, Paragraphs [0087]-[0090]. Nowhere in these Owens Figures or their accompanying description does Owens even hint at "the product location information comprises a map of a retail store and a route through the retail store that passes by the items on the shopping list within the retail store". *See, e.g.*, Owens, Paragraphs [0228]-[0230].

Even the "Store Area Map" shown by Owens in Fig. 40A/B shows the geographical location of the retail store, not the products within a particular store. *See*, Owens, Figs. 40A/B, Paragraph [0114]. Owens does mention "shelf location" as part of a "Purchases List", with no further elaboration, and, as such is insufficient to show anything close to "the product location information comprises a map of a retail store and a route through the retail store that passes by the items on the shopping list within the retail store". (Emphasis Added). *See* Owens, Paragraph [0062]. As such, Applicants respectfully submit that Owens fails to teach, disclose, or even suggest each and every element of amended Claims 1, 20, and 24.

Accordingly, Applicants respectfully submit that Claims 1, 20, and 24 are therefore clearly and precisely patentable over Owens, and the remaining references of record, alone or in any

combination. Therefore, Applicants respectfully request that the rejection of independent Claims 1, 20, and 24 be withdrawn and that independent Claims 1, 20, and 24 be allowed.

Claims 2-15 and 18-19 depend on and further limit Claim 1. Claims 21-23 depend on and further limit Claim 20. Claims 25-26 depend on and further limit Claim 24. As such, Applicants respectfully submit that these dependent Claims are also patentable over Owens, for at least the reasons that their respective independent Claims are patentable over Owens, as described above. Accordingly, Applicants respectfully request that dependent Claims 2-15, 18-19, 21-23, and 25-26 also be allowed.

Claim 3 stands rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Owens in light of U.S. Patent Application Pub. No. 200/0156804 by Janakiraman et al. (“Janakiraman”). Applicants respectfully traverse this rejection.

Specifically, Applicants note that independent Claim 1 is clearly and precisely distinguishable over Owens, as described above, because Owens fails to teach, disclose, or even suggest, “wherein the product location information comprises a map of a retail store and a route through the retail store that passes by the selected retail products within the retail store” as recited in Claim 1.

Referring to Claim 3, the Examiner admits that Owens “does not explicitly disclose wherein the website is accessible by persons with disabilities” and alleges that “it would have been obvious to a person of ordinary skill in the art to have modified the system of Owens to include the teachings of Janakiraman to allow for the website to be accessible to persons with disabilities.” Office Action, Page 8. Nowhere, however, do Owens, Janakiraman, or the Examiner’s proposed combination teach, disclose, or even suggest, “wherein the product location information comprises a map of a

retail store and a route through the retail store that passes by the selected retail products within the retail store” as recited in Claim 1.

As such, because Claim 3 depends on and further limits Claim 1, Applicants respectfully submit that neither Owens, Janakiraman, or the Examiner’s proposed combination teach each and every element as recited in Claim 3. Therefore, for at least this reason, Applicants respectfully submit that Claim 3 is allowable over these and the remaining references of record, alone or in any combination. Applicants therefore respectfully request that the rejection of Claim 3 be withdrawn and that Claim 3 be allowed.

Applicants have now addressed all of the Claim objections and rejections cited in the Office Action. In view of the amendments to the Claims and Applicants’ remarks, Applicants believe that pending Claims 1-15 and 18-26 are in condition for allowance, and respectfully request allowance of Claims 1-15 and 18-26.

Applicants believe no additional fees are due in this Response. In the event that any other fees are due, Applicants hereby authorize the Commissioner to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 09-0447 of IBM Corporation.

Applicants believe that the present Response contains a complete response to the issues raised in the Office Action. Applicants respectfully request full reconsideration. If the Examiner should have any questions, comments or suggestions, the undersigned attorney earnestly requests a telephone conference. In particular, should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, Applicants invite the Examiner to telephone the undersigned at the number listed below.

Respectfully submitted,

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